

I hereby certify that this correspondence is being filed via
EFS-Web with the United States Patent and Trademark Office
on July 26, 2010.

PATENT
Attorney Docket No. 026595-005000US

TOWNSEND and TOWNSEND and CREW LLP

By: /Bonnie Rickles/
Bonnie Rickles

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

In re application of:

Michael J. Michelson

Application No.: 10/806,484

Filed: March 22, 2004

For: EQUIPMENT TO FACILITATE
MONEY TRANSFERS INTO BANK
ACCOUNTS

Confirmation No. 2784

Examiner: Olabode Akintola

Technology Center/Art Unit: 3691

APPELLANTS' REPLY BRIEF

Mail Stop Appeal Brief
Commissioner for Patents
P.O. Box 1450
Alexandria, VA 22313-1450

Commissioner:

This Reply Brief is submitted in response to the Examiner's Answer mailed on May 26, 2010. The following remarks are intended to further focus the issues in this appeal.

In the "Response to Argument" section of the Examiner's Reply, the Examiner states that "Knight teaches that the provider bank formats payment instruction in accordance with a particular clearing system that is going to be used to transfer payment to a foreign bank. It is clear that the provider bank determines what appropriate format depending on which one of the banking networks (German RTGS or German MLNS) is associated with the bank account that is to receive the money (paragraph 0034)." *Examiner's Answer*, p. 13. Applicant respectfully believes that this statement represents a misinterpretation of Knight.

The cited portion of Knight states:

For example, the German bank might only be a member of the German RTGS system and the processing section 210 would format the payment for transmission to this clearing system. Alternatively, the German bank of the supplier might be a member of the German MLNS clearing system which requires a different formatting of the payment message. Once the payment message has been formatted for the appropriate clearing channel, it is transmitted to this clearing channel for ultimate receipt by the German bank.

Knight, ¶34, emphasis added. While the Examiner's Answer implies that the formatting would be varied depending on which of the banking networks is to receive the money, instead, *Knight* appears to only contemplate a bank being a member of *one* banking network. *Knight* explicitly states that the German bank might *only* be a member of the RTGS system or *alternatively* of the MLNS system. Because, the bank is not a member of both, no determination of which banking network to use is made. If there are not multiple banking networks to select from, it is unclear how this section of *Knight* may be used to teach, suggest, or otherwise prove obvious "*determining, with the intermediate computer system, which one of the banking networks is associated with the bank account that is to receive the money,*" as recited in claim 1, and generally recited in claims 5, 11, and 14. Emphasis added.

For at least these reasons and the reasons detailed in the Appellants' Brief, Appellant respectfully requests reversal of the §103 rejections of all pending claims in the application.

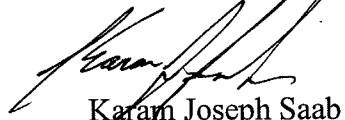
CONCLUSION

For these reasons, it is respectfully submitted that the rejection should be reversed. The Appellants maintain the propriety of the remaining arguments presented in the Appellants' Brief.

Michael J. Michelson
Appl. No. 10/806,484
Page 3

PATENT
Attorney Docket No. 026595-005000US

Respectfully submitted,



Karam Joseph Saab
Reg. No. 64,190

TOWNSEND and TOWNSEND and CREW LLP
Two Embarcadero Center, Eighth Floor
San Francisco, California 94111-3834
Tel: 303-571-4000
Fax: 303-571-4321

62778681 v1